# **EXHIBIT 16**

#### CASE 0:17-cr-00064-DWF-KMM Doc. 91-16 Filed 02/05/18 Page 2 of 13

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## LATHAM & WATKINS LLP

August 20, 2015

## FOIA CONFIDENTIAL TREATMENT REQUESTED VIA EMAIL

Kevin A. Wisniewski U.S. Securities and Exchange Commission 175 West Jackson Blvd., Suite 900 Chicago, Illinois 60604 wisniewskik@sec.gov

> In the Matter of Scio Diamond Technology Corporation (C-08091) Re:

**DX-62** 

Dear Mr. Wisniewski:

Per our discussion, please find enclosed a revised privilege log on behalf of Edward Adams.

Mr. Adams requests that this letter and his information provided in his prior response and production to the SEC (the "Confidential Materials") be maintained in confidence by the SEC and its staff and be used solely for the purposes of this inquiry. Accordingly, we have marked this letter and the enclosed documents "CONFIDENTIAL TREATMENT REQUESTED."

Many of the Confidential Materials concern customarily non-public, confidential, and privileged business and commercial information. The Confidential Materials are exempt from mandatory disclosure under various provisions of the Freedom of Information Act ("FOIA"), 5 U.S.C. § 552(b)(7) (which protects certain "records or information compiled for law enforcement purposes"), 5 U.S.C. § 552(b)(4) (which protects trade secrets and confidential and privileged financial and commercial information), and 5 U.S.C. § 552(b)(6) (which protects files "the disclosure of which would constitute a clearly unwarranted invasion of personal privacy").<sup>2</sup> Because the Confidential Materials relate to the business activities of Mr. Adams and not the activities of any federal agency, we believe they are exempt from disclosure under FOIA.<sup>3</sup> The

See, e.g., NLRB v. Robbins Tire & Rubber Co., 437 U.S. 214 (1978).

<sup>2</sup> See, e.g., U.S. Dep't of Def. v. Fed. Labor Relations Auth., 510 U.S. 487 (1994).

<sup>3</sup> 5 U.S.C. §§ 552(b)(6), (b)(7)(C); U.S. Dep't of Def., 510 U.S. at 487; Dep't of Justice v. Reporters Comm. for Freedom of Press, 489 U.S. 749 (1989).

August 20, 2015

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SEC treats records falling within the FOIA exemption categories as "non-public" and "will generally not publish or make available to any person" such records. 17 C.F.R. § 200.80(b). Moreover, disclosure of the Confidential Materials may be prohibited under 18 U.S.C. § 1905, and further protections may be available under the Privacy Act of 1974, 5 U.S.C. § 552a.

In accordance with 17 C.F.R. § 200.83 and other applicable laws and regulations, Mr. Adams submits the Confidential Materials with a request that they be kept in a non-public file and that only SEC staff have access to them. If any person not a member of the SEC or its staff (including without limitation any government employee) should request an opportunity to inspect or copy the Confidential Materials, pursuant to the FOIA or otherwise, or if you or any member of the SEC or its staff contemplates disclosure of the Confidential Materials to any other person, Mr. Adams requests that the undersigned immediately be notified of such request, be furnished a copy of all written materials pertaining to such request (including but not limited to the request itself), and be given advance notice of any intended release so that Mr. Adams may, if deemed necessary or appropriate, pursue any remedies available. See, e.g., Chrysler Corp. v. Brown, 441 U.S. 281 (1979). Mr. Adams expects to be provided the opportunity to object to such disclosure, and therefore requests that you telephone the undersigned rather than rely upon the U.S. mail for such notice.

Mr. Adams expects that if the SEC is inclined to grant any FOIA request for the Confidential Materials, it will follow the procedures set forth in 17 C.F.R § 200.83 and Executive Order 12,600, 52 Fed. Reg. 23,781 (June 25, 1987). Mr. Adams stands ready to further substantiate this request for confidential treatment and to request a hearing on the claim of exemption.

The request set forth in the preceding paragraphs also applies to any memoranda, notes, transcripts or other writings of any sort whatsoever that are made by, or at the request of, any employee of the SEC (or any other government agency) and which (1) incorporate, include or relate to any of the Confidential Materials; or (2) refer to any conference, meeting, or telephone conversation between Mr. Adams on the one hand and employees of the SEC (or any other government agency) on the other, relating to the Confidential Materials.

The Confidential Materials remain the property of Mr. Adams. Accordingly, at the conclusion of this inquiry, we request such material (and any copies thereof) be returned to the undersigned.

If the SEC decides to transfer any of the Confidential Materials to another federal agency, Mr. Adams requests that you forward a copy of this letter to any such agency with the Confidential Materials. We request that you indicate to any such agency that Mr. Adams has requested the return of this material to the undersigned at the completion of the agency's efforts in this matter and have requested that this material be accorded confidential treatment.

Provision of the Confidential Materials is not intended to, and does not, waive any applicable privilege or other legal basis under which information may not be subject to production. If it were found that production of any of the Confidential Materials constitutes disclosure of otherwise privileged matters, such disclosure would be inadvertent. By the

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#### LATHAM&WATKINS LLP

production of such documents, Mr. Adams does not intend to and have not waived the attorney-client privilege or any other protections.

\* \* \*

If you have any questions concerning this correspondence, please contact me at (312) 876-6580.

Sincerely,

John J. Skorz, Jr. Lcc John J. Sikora, Jr.

of LATHAM & WATKINS LLP

Enclosure

cc: James J. Farrell

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Date	Author Entity	Individual Author	Recipient Entity	Ind. Recipient (Attn)	Subject	Privilege Description	Privilege Type	Document Type
						Legal Bill; Communication between attorney and	Attorney-client	
	Adams, Monahan &				Apollo Diamond Inc. Expenses	client regarding legal services provided; work	privilege; attorney	
15-Nov-05	Sankovitz LLP	n/a	Apollo Diamond, Inc.	Lisa Linares	in Connection with Legal Matter	descriptions for legal services provided	work product	Hard copy document
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Aug-11	Adams Monahan, LLP	n/a	Apollo Diamond, Inc.	n/a	Invoice	descriptions for legal services provided	work product	Hard copy document
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15-Apr-13	Adams Monahan, LLP	n/a	Corporation	Pfohl	Invoice	descriptions for legal services provided	work product	Hard copy document
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15-Apr-13	Adams Monahan, LLP	n/a	Corporation	Pfohl	Invoice	descriptions for legal services provided	work product	Hard copy document
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12-Jun-13	Adams Monahan, LLP	n/a	Corporation	Pfohl	Invoice	descriptions for legal services provided	work product	Hard copy document
			Scio Diamond			Legal Bill; Communication between attorney and	Attorney-client	
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12-Jun-13	Adams Monahan, LLP	n/a	Corporation	Pfohl	Invoice	descriptions for legal services provided	work product	Hard copy document
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			Technology	Jonathan		client regarding legal services provided; work	privilege; attorney	
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12 Juli 13	Additionalian, EEI	11/4	Corporation	1 10111	invoice .	descriptions for legar services provided	work product	пага сору аоситент
			Scio Diamond			Legal Bill; Communication between attorney and	Attorney-client	
			Technology	Jonathan		client regarding legal services provided; work	privilege; attorney	
15-Anr-13	Adams Monahan, LLP	n/a	Corporation	Pfohl	Invoice	descriptions for legal services provided	work product	Hard copy document
13-Aþi-13	Additis Wionalian, EEI	Пуа	Corporation	110111	invoice	descriptions for legal services provided	work product	пата сору абситет
			Scio Diamond			Legal Bill; Communication between attorney and	Attorney-client	
			Technology	Jonathan		client regarding legal services provided; work	privilege; attorney	ĺ
15-Anr-12	Adams Monahan, LLP	n/a	Corporation	Pfohl	Invoice	descriptions for legal services provided	work product	Hard copy document
13-Aþi-13	Additis Monanan, LLF	ii/a	Corporation	FIOIII	ilivoice	descriptions for legal services provided	work product	пати сору иосиптент
			Scio Diamond			Legal Bill; Communication between attorney and	Attorney-client	
			Technology				privilege; attorney	
44 14 42	A -l A A l 11 B	- 1-	J	- /-	lavaias	client regarding legal services provided; work	, ,	Hand and day on the
11-Mar-13	Adams Monahan, LLP	n/a	Corporation	n/a	Invoice	descriptions for legal services provided	work product	Hard copy document
			Caia Diamand			Local Bill. Communication hat were attached	Attaus aliant	
			Scio Diamond			Legal Bill; Communication between attorney and	Attorney-client	
		l .	Technology			client regarding legal services provided; work	privilege; attorney	
11-Mar-13	Adams Monahan, LLP	n/a	Corporation	Joseph Lancia	Invoice	descriptions for legal services provided	work product	Hard copy document
			G : B: I					
			Scio Diamond			Legal Bill; Communication between attorney and	Attorney-client	
			Technology			client regarding legal services provided; work	privilege; attorney	
11-Mar-13	Adams Monahan, LLP	n/a	Corporation	n/a	Invoice	descriptions for legal services provided	work product	Hard copy document
			Scio Diamond			Legal Bill; Communication between attorney and	Attorney-client	
			Technology			client regarding legal services provided; work	privilege; attorney	
5-Feb-13	Adams Monahan, LLP	n/a	Corporation	n/a	Invoice	descriptions for legal services provided	work product	Hard copy document
			Scio Diamond			Legal Bill; Communication between attorney and	Attorney-client	ĺ
			Technology			client regarding legal services provided; work	privilege; attorney	
5-Feb-13	Adams Monahan, LLP	n/a	Corporation	Joseph Lancia	Invoice	descriptions for legal services provided	work product	Hard copy document
			Scio Diamond			Legal Bill; Communication between attorney and	Attorney-client	
			Technology			client regarding legal services provided; work	privilege; attorney	
5-Feb-13	Adams Monahan, LLP	n/a	Corporation	n/a	Invoice	descriptions for legal services provided	work product	Hard copy document
			Scio Diamond			Legal Bill; Communication between attorney and	Attorney-client	
			Technology			client regarding legal services provided; work	privilege; attorney	
4-Jan-13	Adams Monahan, LLP	n/a	Corporation	n/a	Invoice	descriptions for legal services provided	work product	Hard copy document

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			Scio Diamond			Legal Bill; Communication between attorney and	Attorney-client	
			Technology			client regarding legal services provided; work	privilege; attorney	
4-Jan-13	Adams Monahan, LLP	n/a	Corporation	n/a	Invoice	descriptions for legal services provided	work product	Hard copy document
		.,.		.,			Production of the state of the	na a copy accument
			Scio Diamond			Legal Bill; Communication between attorney and	Attorney-client	
			Technology			client regarding legal services provided; work	privilege; attorney	
4-lan-13	Adams Monahan, LLP	n/a	Corporation	n/a	Invoice	descriptions for legal services provided	work product	Hard copy document
	riadina irrandianan, 221	.,,	co.po.ac.o	.,,		accompliance for regarder vices provided	Work product	nara copy accament
			Scio Diamond			Legal Bill; Communication between attorney and	Attorney-client	
			Technology			client regarding legal services provided; work	privilege; attorney	
13-Dec-12	Adams Monahan, LLP	n/a	Corporation	n/a	Invoice	descriptions for legal services provided	work product	Hard copy document
10 200 11	riadino irronanan, 221	.,,	co.po.ac.o	.,,		accompanions for regarder vices provided	Work product	nara copy accament
			Scio Diamond			Legal Bill; Communication between attorney and	Attorney-client	
			Technology			client regarding legal services provided; work	privilege; attorney	
13-Dec-12	Adams Monahan, LLP	n/a	Corporation	n/a	Invoice	descriptions for legal services provided	work product	Hard copy document
10 500 12	riadino irronanan, 221	.,,	co.po.ac.o	.,,		accompanions for regarder vices provided	Work product	nara copy accument
			Scio Diamond			Legal Bill; Communication between attorney and	Attorney-client	
			Technology			client regarding legal services provided; work	privilege; attorney	
13-Dec-12	Adams Monahan, LLP	n/a	Corporation	n/a	Invoice	descriptions for legal services provided	work product	Hard copy document
15 Dec 12	rtaams Wonanan, EE	11, 4	co.po.ac.o	.,,		descriptions for legar services provided	Work product	nara copy accument
			Scio Diamond			Legal Bill; Communication between attorney and	Attorney-client	
			Technology			client regarding legal services provided; work	privilege; attorney	
15-Nov-12	Adams Monahan, LLP	n/a	Corporation	n/a	Invoice	descriptions for legal services provided	work product	Hard copy document
13 1101 12	Additis Wicharlan, EE	ny u	Corporation	11/4	invoice	descriptions for legal services provided	Work product	пага сору абсателе
			Scio Diamond			Legal Bill; Communication between attorney and	Attorney-client	
			Technology			client regarding legal services provided; work	privilege; attorney	
17-Oct-12	Adams Monahan, LLP	n/a	Corporation	n/a	Invoice	descriptions for legal services provided	work product	Hard copy document
17-000-12	Additis Wionalian, EEI	ii/ a	Corporation	ny a	invoice	descriptions for legal services provided	Work product	пага сору абсателс
			Scio Diamond			Legal Bill; Communication between attorney and	Attorney-client	
			Technology			client regarding legal services provided; work	privilege; attorney	
12-Sen-12	Adams Monahan, LLP	n/a	Corporation	n/a	Invoice	descriptions for legal services provided	work product	Hard copy document
12-3ep-12	Additis Wionalian, EEI	ii/ a	Corporation	ny a	invoice	descriptions for legal services provided	Work product	riard copy document
			Scio Diamond			Legal Bill; Communication between attorney and	Attorney-client	
			Technology			client regarding legal services provided; work	privilege; attorney	
12-Sen-12	Adams Monahan, LLP	n/a	Corporation	n/a	Invoice	descriptions for legal services provided	work product	Hard copy document
12-36h-12	Adding Monanan, LLF	11/ u	Corporation	11/4	IIIVOICC	acsemptions for legal services provided	work product	nara copy document
			Scio Diamond			Legal Bill; Communication between attorney and	Attorney-client	
			Technology			client regarding legal services provided; work	privilege; attorney	
16-Aug-12	Adams Monahan, LLP	n/a	Corporation	n/a	Invoice	descriptions for legal services provided	work product	Hard copy document
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			Scio Diamond			Legal Bill; Communication between attorney and	Attorney-client	
			Technology			client regarding legal services provided; work	privilege; attorney	
16-Aug-12	Adams Monahan, LLP	n/a	Corporation	n/a	Invoice	descriptions for legal services provided	work product	Hard copy document
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			Scio Diamond			Legal Bill; Communication between attorney and	Attorney-client	
			Technology			client regarding legal services provided; work	privilege; attorney	
20-Jul-12	Adams Monahan, LLP	n/a	Corporation	n/a	Invoice	descriptions for legal services provided	work product	Hard copy document
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			Scio Diamond			Legal Bill; Communication between attorney and	Attorney-client	
			Technology			client regarding legal services provided; work	privilege; attorney	
11_lul_12	Adams Monahan, LLP	n/a	Corporation	n/a	Invoice	descriptions for legal services provided	work product	Hard copy document
11-301-12	Additis Wionalian, LLF	11/ a	Corporation	II/a	invoice	descriptions for legal services provided	work product	наги сору иосиптент
			Scio Diamond			Legal Bill; Communication between attorney and	Attorney-client	
			Technology			client regarding legal services provided; work	privilege; attorney	
1/1-Dec-11	Adams Monahan, LLP	n/a	Corporation	n/a	Invoice	descriptions for legal services provided	work product	Hard copy document
14-Dec-11	Additis Monarian, ELF	11/ a	Corporation	II/a	invoice	descriptions for legal services provided	work product	пати сору иоситет
			Scio Diamond			Legal Bill; Communication between attorney and	Attorney-client	
			Technology			client regarding legal services provided; work	privilege; attorney	
16 Doc 11	Adams Monahan, LLP	n/a	Corporation	n/a	Invoice	descriptions for legal services provided	work product	Hard copy document
10-Dec-11	Additis Monarian, ELF	11/ a	Corporation	II/a	invoice	descriptions for legal services provided	work product	пати сору иоситет
			Scio Diamond			Legal Bill; Communication between attorney and	Attorney-client	
			Technology				privilege; attorney	
4.0 -+ 11	Adama Manahan IID	- /-	0,	2/2	Invoice	client regarding legal services provided; work	, ,	Hand as an description
4-Oct-11	Adams Monahan, LLP	n/a	Corporation	n/a	Invoice	descriptions for legal services provided	work product	Hard copy document
			Scio Diamond			Logal Pills Communication between atternoy and	Attornov client	
						Legal Bill; Communication between attorney and	Attorney-client	
445 44		<b>!</b> ,	Technology	,		client regarding legal services provided; work	privilege; attorney	
14-Dec-11	Adams Monahan, LLP	n/a	Corporation	n/a	Invoice	descriptions for legal services provided	work product	Hard copy document
			Saia Diamond			Logal Bills Communication between atternoy and	Attornov client	
			Scio Diamond			Legal Bill; Communication between attorney and	Attorney-client	
10.5		<b>!</b> ,	Technology	,		client regarding legal services provided; work	privilege; attorney	
19-Dec-11	Adams Monahan, LLP	n/a	Corporation	n/a	Invoice	descriptions for legal services provided	work product	Hard copy document
			Caia Diamand			Land Bill Communication hat we are attended	A++	
			Scio Diamond			Legal Bill; Communication between attorney and	Attorney-client	
44.44		<b>,</b>	Technology	,		client regarding legal services provided; work	privilege; attorney	
14-May-12	Adams Monahan, LLP	n/a	Corporation	n/a	Invoice	descriptions for legal services provided	work product	Hard copy document
						Logal Bills Communication between attacases and	Attornov client	
			A II . B' I			Legal Bill; Communication between attorney and	Attorney-client	
		<b>1</b> ,	Apollo Diamond	<b>l</b> ,	l	client regarding legal services provided; work	privilege; attorney	L
1-Aug-11	Adams Monahan, LLP	n/a	Gemstone Corporation	n/a	Invoice	descriptions for legal services provided	work product	Hard copy document
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			A cella Bio			Legal Bill; Communication between attorney and	Attorney-client	
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1-Aug-11	Adams Monahan, LLP	n/a	Gemstone Corporation	n/a	Invoice	descriptions for legal services provided	work product	Hard copy document
						Land Bills Communication had a second	Attauran eller	
			A II . B' I			Legal Bill; Communication between attorney and	Attorney-client	
4	A.J	l.,	Apollo Diamond	l.,		client regarding legal services provided; work	privilege; attorney	L
1-Jul-11	Adams Monahan, LLP	n/a	Gemstone Corporation	n/a	Invoice	descriptions for legal services provided	work product	Hard copy document

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			Apollo Diamond			Legal Bill; Communication between attorney and client regarding legal services provided; work	Attorney-client privilege; attorney	
1-Jul-11	Adams Monahan, LLP	n/a	Gemstone Corporation	n/a	Invoice	descriptions for legal services provided	work product	Hard copy document
		n/a	Apollo Diamond Gemstone Corporation		Invoice	Legal Bill; Communication between attorney and client regarding legal services provided; work descriptions for legal services provided	Attorney-client privilege; attorney work product	Hard copy document
30-Sep-05	Adams, Monahan & Sankovitz LLP	n/a	Apollo Diamond, Inc.	Bryant Linares	Legal Services Quarter Ended September 30, 2005	Legal Bill; Communication between attorney and client regarding legal services provided; work descriptions for legal services provided	Attorney-client privilege; attorney work product	Hard copy document
31-Dec-05	Adams, Monahan & Sankovitz LLP	n/a	Apollo Diamond, Inc.	Bryant Linares	Legal Services Quarter Ended December 31, 2005	Legal Bill; Communication between attorney and client regarding legal services provided; work descriptions for legal services provided	Attorney-client privilege; attorney work product	Hard copy document
2-Jan-09	Adams Monahan, LLP	n/a	Apollo Diamond, Inc. & Apollo Diamond Gemstone Corporation		Legal Services Calendar Year 2008	Legal Bill; Communication between attorney and client regarding legal services provided; work descriptions for legal services provided	Attorney-client privilege; attorney work product	Hard copy document
4-Jan-10	Adams Monahan, LLP	n/a	Apollo Diamond, Inc. & Apollo Diamond Gemstone Corporation		Legal Services Calendar Year 2009	Legal Bill; Communication between attorney and client regarding legal services provided; work descriptions for legal services provided	Attorney-client privilege; attorney work product	Hard copy document
3-Jan-11	Adams Monahan, LLP	n/a	Apollo Diamond, Inc. & Apollo Diamond Gemstone Corporation	Robert Linares	Legal Services Calendar Year 2010	Legal Bill; Communication between attorney and client regarding legal services provided; work descriptions for legal services provided	Attorney-client privilege; attorney work product	Hard copy document
1-Jul-12	Adams Monahan, LLP	Edward Adams	Scio Diamond Technology Corporation	Joseph Lancia	Retainer Agreement	Communication between attorney and client regarding legal services provided; work descriptions for legal services provided	Attorney-client privilege; attorney work product	Hard copy document